

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 5:22-cr-00008
18 U.S.C. § 1343

WANDA JANE GOODE

INFORMATION

The United States Attorney charges:

BACKGROUND

At all times relevant to this Information:

1. Defendant WANDA JANE GOODE resided in Shady Spring, Raleigh County, West Virginia, within the Southern District of West Virginia.
2. A local supermarket (hereinafter, the "Victim Supermarket") was located in Beaver, Raleigh County, West Virginia, within the Southern District of West Virginia.
3. From at least April 2014 until in or around September 2019, Defendant WANDA JANE GOODE worked as a cashier at the Victim Supermarket.
4. The Victim Supermarket sold Visa prepaid debit cards ("prepaid cards") as an agent and/or authorized delegate of U.S. Bank, National Association ("U.S. Bank"). The Victim Supermarket also sold prepaid cards as an agent and/or authorized delegate of Green Dot Corporation.
5. At the time of each prepaid card sale, the Victim Supermarket provided U.S. Bank with the card number and monetary value for the prepaid card. The Victim Supermarket provided such information to U.S. Bank's processor using a Payment Card Industry-Complaint or PCI-

Compliant method of transmission. U.S. Bank then activated the prepaid card for permitted use in the United States up to the monetary value of the prepaid card. U.S. Bank then funded and honored all prepaid cards immediately upon activation or reload.

6. The Victim Supermarket assigned its cashiers to activate the prepaid card in connection with authorized sales to customers of the Victim Supermarket. The Victim Supermarket did not authorize defendant WANDA JANE GOODE to fraudulently activate prepaid cards for her personal purchases.

7. U.S. Bank is insured by the FDIC and was a financial institution pursuant to 18 U.S.C. § 20.

THE SCHEME

8. In or around April 2019 and continuing to in or around September 2019, defendant WANDA JANE GOODE knowingly devised and intended to devise a scheme to defraud the Victim Supermarket and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS OF THE SCHEME

9. As part of the scheme to defraud, defendant WANDA JANE GOODE fraudulently activated the prepaid cards to purchase items for her own personal use and benefit.

10. It was further a part of the scheme to defraud that defendant WANDA JANE GOODE used the fraudulently activated prepaid cards to purchase items for her own personal use and benefit from the Victim Supermarket, as well as from other retailers, restaurants, gas stations, and convenience stores, for purchases including, but not limited to, clothing, food, automobiles, pets, entertainment, and online shopping.

11. In furtherance of the scheme to defraud, defendant WANDA JANE GOODE fraudulently activated the prepaid cards. As part of the activation process, the prepaid card activation request and associated data was transmitted electronically from the Victim Supermarket in the State of West Virginia through a server in Richardson, Texas. Once the data arrived electronically, the funds used to fraudulently activate the prepaid cards were transmitted electronically between Victim Supermarket, the State of West Virginia, and U.S. Bank, the State of Minnesota.

12. In furtherance of the scheme to defraud, Defendant WANDA JANE GOODE activated at least 168 prepaid cards in the amount of \$501.50.

13. In furtherance of the scheme to defraud, defendant WANDA JANE GOODE would falsely claim customers were returning a prepaid card by taking an unopened and unsold prepaid card and processing it as a return. Her cash register would reflect that the Victim Supermarket owed a credit in the amount of \$501.50 to the "customer." She would then "sell" a different unopened and unsold prepaid card to herself. As such, the transaction would be completed and a zero balance would show up on her register. That is because defendant WANDA JANE GOODE had used the credit from the first "returned" prepaid card transaction to "pay" for the second prepaid card that was then fraudulently activated. She would then throw away the packaging and actual prepaid card that had been "returned" to conceal her activities.

14. From in and around April 2019 to in and around September 2019, defendant WANDA JANE GOODE made numerous unauthorized purchases using the fraudulently activated prepaid card, resulting in a loss to the Victim Supermarket in the amount of approximately \$87,000.

WIRE TRANSMISSION

15. On or about June 16, 2019, at or near Beaver, Raleigh County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant WANDA JANE GOODE, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures, and sounds when she activated \$501.50 on the prepaid card sold by the Victim Supermarket to pay for her personal expenses.

16. In furtherance of the scheme to defraud, defendant WANDA JANE GOODE would hide her scheme by falsifying return data. Specifically, Defendant WANDA JANE GOODE would falsely claim customers were returning a prepaid card, when in fact, they would not do so. Defendant WANDA JANE GOODE would then sell herself a prepaid card using the credit she generated by improperly “returning” a prepaid card.

In violation of Title 18, United States Code, Section 1343.

WILLIAM S. THOMPSON

United States Attorney

By:



NEGAR M. KORDESTANI

Assistant United States Attorney